

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: September 12, 2024 at 1:00 P.M. ET

Objection Deadline: July 24, 2024 at 4:00 P.M. ET

Ref. Nos. 17636 & 17648

**CERTIFICATION OF COUNSEL REGARDING DEBTORS' FIFTIETH (NON-SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN CLAIMS
FILED AGAINST THE INCORRECT DEBTOR**

I, Matthew R. Pierce, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”) hereby certify as follows to the best of my knowledge, information and belief:

1. On June 14, 2024, the Debtors filed the *Debtors' Fiftieth (Non-Substantive) Omnibus Objection to Certain Claims Against the Incorrect Debtor* [D.I. 17636, redacted & 17648, sealed] (the “Objection”).

2. Pursuant to the Notice of Objection attached to the Objection [D.I. 17636-1 & 17648-1], any responses to the Objection were to be filed no later than July 24, 2024, at 4:00 p.m. (ET) (the “Response Deadline”).

3. The Debtors received informal responses (the “Informal Responses”) to the Objection from the holders of claim numbers 64518, 38501, 63668, 59340, and 8067.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

4. On July 11, 2024, Jean Eric Etienne filed a letter in response to the Objection [D.I. 20067] (the “Etienne Response”).

5. On July 12, 2024, Magdalena Bissels filed a letter in response to the Objection [D.I. 20468] (the “Bissels Response”).

6. On July 17, 2024, and July 23, 2024, Takuya Yokoyama filed letters in response to the Objection [D.I. 20746, D.I. 20747 and D.I. 21146] (the “Yokoyama Responses”).

7. On July 17, 2024, and August 13, 2024, Takuya Nagasaka filed letters in response to the Objection [D.I. 20744 and D.I. 22947] (the “Nagasaka Responses”).

8. On July 15, 2024, Antione Ribeyre filed a letter in response to the Objection [D.I. 20466] (the “Ribeyre Response”).

9. On July 24, 2024, Emmanuel Fauquet filed a letter in response to the Objection [D.I. 21567] (the “Fauquet Response”).

10. On July 26, 2024, Umut Isik Cengiz filed a letter in response to the Objection [D.I. 21635] (the “Cengiz Response”).

11. As of the Date hereof, no other formal responses or other responses to the Objection have been filed or served on the Debtors, besides the Etienne Response, the Bissels Response, the Yokoyama Responses, the Nagasaka Responses, the Ribeyre Response, the Fauquet Response, and the Cengiz Response.

12. The Debtors have revised the proposed form of order (the “Revised Order”), a copy of which is attached hereto as **Exhibit A**, to reflect the adjournments to the Objection solely with respect to the claims of Etienne, Bissels, Yokoyama, Nagasaka, Ribeyre, Fauquet, and Cengiz and holders of proofs of claim numbers 64518, 38501, 63668, 59340, and 8067. A copy of the Revised Order compared against the proposed form of order attached to the Objection is attached hereto as

Exhibit B. The Revised Order has been circulated to the Official Committee of Unsecured Creditors (the “Committee”), and the Committee has no objection to entry of the Revised Order. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

13. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: December 2, 2024
Wilmington, Delaware

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/s/ Matthew R. Pierce

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